

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION**

UNITED STATES OF AMERICA

v.

SHABBA LARUN CHANDLER,

Defendant

Case No.: 4:18-CR-00011-MFU-RSB

**DEFENDANT’S MOTION *IN LIMINE* TO EXCLUDE CERTAIN PROPOSED TRIAL
EXHIBITS AND OBJECTIONS TO THE GOVERNMENT’S PROPOSED EXHIBITS**

COMES NOW, the Defendant, Shabba L. Chandler (the “Defendant”), by counsel, and hereby submits as follows for his Motion *in Limine* and Objections to the Government’s Proposed Exhibits. The reasons for each objection and the grounds for exclusion of each exhibit are set forth herein or, where indicated, in the forthcoming accompanying memorandum of law.

GENERAL OBJECTIONS

The Defendant objects to the Government’s exhibits to the extent they violate the confrontation clause and the Defendant’s Sixth Amendment rights.

The Defendant objects to the introduction of any firearm identification evidence as articulated in his Motion to Exclude Firearm Identification Evidence. [ECF No. 581].

SPECIFIC OBJECTIONS

The Defendant hereby moves to exclude the exhibits identified below for the ground(s) contained in the Objection(s) column, specifically the introduction of the exhibits identified below would violate the Federal Rule(s) of Evidence identified.

Exhibit Number	Description	Objection(s)
1	DPD Incident Rpt # 15-010628 re aggravated assault at 177 Sunset Dr., Danville, 12/9/2015	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Impermissible character evidence. Fed. R.

		Evid. 404(b)(1); <i>see also</i> accompanying memorandum
2	PHOTO: House and Street	Relevance. Fed. R. Evid. 402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
3	PHOTO: Front door and porch	Relevance. Fed. R. Evid. 402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
4	PHOTO: Porch and chairs	Relevance. Fed. R. Evid. 402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
5	PHOTO: Living room, TV w/bullet hole	Relevance. Fed. R. Evid. 402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
6	PHOTO: Living room, TV, front door	Relevance. Fed. R. Evid. 402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
7	PHOTO: Carpet w/ bullet	Relevance. Fed. R. Evid. 402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
8	PHOTO: Wall w/bullet hole	Relevance. Fed. R. Evid. 402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
9	PHOTO: Front door and wall w/bullet holes	Relevance. Fed. R. Evid. 402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
10	PHOTO: Wall w/bullet holes	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
11	PHOTO: Refrigerator w/bullet hole	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
12	PHOTO: Wall w/ bullet hole next to refrigerator	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum

13	PHOTO: Bedroom wall w/bullet holes	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
14	Request for Lab Exam re ballistics	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
15	Certificate of Analysis # W15-11669 re ballistics, 6/30/2016	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
16	Certificate of Analysis # W15-11669 Supplemental Report, 7/7/2016	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
17	Certificate of Analysis # W15-11669 Supplemental Report, 5/7/2019	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
18	PHOTOS: Item 1 of Lab Report W15-11669	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
19	PHOTOS: Item 12 of Lab Report W15-11669	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
20	PHOTOS: Test fires rounds from Lab Report W15-11669	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
21	Full Report re W15-11669, 6/30/2016 including examiner worksheets	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
22	Full Supplemental Report, 7/7/2016 re W15-11669 including examiner worksheets, IBIS TRAX worksheets	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
23	Full Supplemental Report, 5/17/2019 re W15-11669 including examiner worksheets	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
24	DPD Incident Rpt # 16-003150 re aggravated assault at 44	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.

	Garland St, Danville, 4/26/2016	Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
25	DPD Incident Rpt # 16-003152 re aggravated assault at 618 Berryman Ave., Danville, 4/26/2016	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
26	PHOTO: Street view	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
27	PHOTO: Street view	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
28	PHOTO: Street, Black Impala rear	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
29	PHOTO: Street, Black Impala front	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
30	PHOTO: Front of Black Impala, evidence marker 8	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
31	PHOTO: Black Impala, evidence markers 9, 10	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
32	PHOTO: Rear of Impala, evidence markers 1- 4	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
33	PHOTO: Rear of Impala, evidence markers 9-11	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
34	PHOTO: Passenger side of Impala, evidence markers 8-12	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
35	PHOTO: Front driver's side of Impala, evidence markers 5-7	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R.

		Evid. 404(b)(1); <i>see also</i> accompanying memorandum
36	PHOTO: Front of Impala, evidence markers 5, 8-11	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
37	PHOTO: Evidence marker 9 - magazine	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
38	PHOTO: Evidence marker 9 - magazine	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
39	PHOTO: Evidence markers 10-12, shell casings	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
40	PHOTO: Evidence marker 14-15, shell casings	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
41	PHOTO: Evidence markers 16-17, shell casings	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
42	PHOTO: Black Impala	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
43	PHOTO: VIN of Black Impala	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
44	PHOTO: Front seat of Impala through driver window	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
45	PHOTO: Rear seat of Impala through driver side rear window, rifle	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
46	PHOTO: Rear seat of Impala through passenger side rear window, rifle	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum

47	PHOTO: Front seat of Impala through passenger window	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
48	PHOTO: Front passenger rear door armrest, 6 bullets	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
49	PHOTO: Front driver's side rear door armrest, bullets	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
50	PHOTO: Front of white 2 story house, # 755	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
51	PHOTO: Side of white structure, bullet hole	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
52	PHOTO: House number 755 # 2	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
53	PHOTO: Interior of 755, wall w/ bullet hole	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
54	PHOTO: Interior of 755, wall w/ bullet hole	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
55	PHOTO: Chevy HRV, front driver's window broken	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
56	PHOTO: Shattered glass on front driver's seat	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
57	PHOTO: Bullet hole in rear quarter panel above tire	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
58	PHOTO: Blood stains on interior front passenger door	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R.

		Evid. 404(b)(1); <i>see also</i> accompanying memorandum
59	Certificate of Analysis W16-4792 re ballistics, Items 1, 4, 5; 11/1/2016 (re: DPD Rpt 16-3150)	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
60	Certificate of Analysis # W16-4792 Supplemental Report, Item 4; 11/21/2016 (re: DPD Rpt 16-3150)	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
61	Certificate of Analysis # W16-4792 Supplemental Report, Item 4; 5/14/2019 (re: DPD Rpt 16-3150)	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
62	Certificate of Analysis W16-4230 re ballistics, Items 5-21, 23, 26; 11/7/2016 (re: DPD Rpt 16-3152)	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
63	Certificate of Analysis # W16-4230 Supplemental Report, Items 12, 23, 26; 11/28/2016 (re: DPD Rpt 16-3152)	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
64	Certificate of Analysis # W16-4230 Supplemental Report, Items 23, 26; 5/17/2019 (re: DPD Rpt 16-3152)	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
65	Full Report re W16-4792, 11/1/16/2016 including examiner worksheets	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
66	Potential NIBIN Association re COA W16-4792, 5/1/2017	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
67	Full Supplemental Report re W16-4792, 11/21/2016 including examiner worksheets	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
68	Full Supplemental Report re W16-4792, 5/14/2019 including examiner worksheets	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
69	Full Report re W16-4230, 11/7/16/2016 including examiner worksheets	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum

70	Potential NIBIN Association re COA W16-4230, 5/1/2017	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
71	Full Supplemental Report re W16-4230, 11/28/2016 including examiner worksheets	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
72	Full Supplemental Report re W16-4230, 5/17/2019 including examiner worksheets	Relevance. Fed. R. Evid.402- 403. Impermissible character evidence. Fed. R. Evid. 404(b)(1); <i>see also</i> accompanying memorandum
73	DPD Incident Rpt # 16-004722 re aggravated assault at 111 North Hills Court, Danville, 6/16/2016	Hearsay. Fed. R. Evid. 802.
182	DPD Incident 16-006833, Motley homicide, 8/20/2016	Hearsay. Fed. R. Evid. 802.
183	911 Communication Event Report, 8/20/2016	Hearsay. Fed. R. Evid. 802.
191	PHOTO: Body bag evidence tag	Relevance. Fed. R. Evid. 402- 403.
215	Homicide-file 3 Transcript	Hearsay. Fed. R. Evid. 802.
236	PHOTO: Body bag with tag	Relevance. Fed. R. Evid. 402- 403.
241	Diagram of projectile path	Cumulative. Fed. R. Evid. 403
246	Maryland National Park Police Arrest Record	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
247	Maryland National Park Police Property Record for Smith & Wesson .40 cal handgun, SN FYH4828	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
263	DPD Incident 16-006954, aggravated assault on Colquhoun St., Danville, 8/24/2016	Hearsay. Fed. R. Evid. 802.
298	DPD Incident 16-008984 re drug/gun violations	Hearsay. Fed. R. Evid. 802.
318	DPD Incident 16-009055, search warrant execution at 252 Parker Rd.; 11/4/2016	Hearsay. Fed. R. Evid. 802.
324	Firearm and Toolmark Identification slides	Improper Summary. Fed. R. Evid. 1006.
1139	Facebook Conversation 2015_09_22-KS-Photo 864675433587950.jpg	Hearsay. Fed. R. Evid. 802. Best Evidence Rule. Fed. R. Evid. 1002.
1140	Facebook Conversation	Hearsay. Fed. R. Evid. 802.

	2015_09_22-KS-Photo 864675436921283.jpg	Best Evidence Rule. Fed. R. Evid. 1002.
1141	Facebook Conversation 2015_09_22-KS-Photo 864675440254616.jpg	Hearsay. Fed. R. Evid. 802. Best Evidence Rule. Fed. R. Evid. 1002.
1142	Facebook Conversation 2015_09_22-KS-Photo 864675443587949.jpg	Hearsay. Fed. R. Evid. 802. Best Evidence Rule. Fed. R. Evid. 1002.
1144	Facebook Conversation 2015_9_22- KS-Photo 864675430254617.jpg	Hearsay. Fed. R. Evid. 802. Best Evidence Rule. Fed. R. Evid. 1002.
1514	302: re Shabba Chandler Cellphones	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
1515	302: re Shabba Chandler and Montez Allen cellphones	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
1516	Laquante Adams Arrest Vid000_Clip 1_s.mp4; Clip: 40:57 - 45:58	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1517	Laquante Adams Nov 2018 FBI arrest video Part 1 transcript	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1518	Laquante Adams Arrest Vid001_Clip 2_s.mp4; Clip: 01:46 - 18:58	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1519	Laquante Adams Arrest Vid001_Clip 3_s.mp4; Clip: 30:21 - 35:05	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1520	Laquante Adams Nov 2018 FBI arrest video Parts 2, 3 transcript	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1521	Laquantes Adams Proffer Agreement, 3/11/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1522	302 re Adams interview, 3/11/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1523	Agent Notes of Adams interview, 3/11/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1524	Laquantes Adams Proffer Agreement, 3/20/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1525	302 re Adams interview, 3/20/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1526	Agent Notes of Adams interview,	Hearsay. Fed. R. Evid. 802.

	3/20/2019	Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1558	Laquante Adams Plea Form, 3/26/2019	Relevance. Fed. R. Evid. 402- 403.
1559	Tyson Bowens Grand Jury Transcript, 11/5/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1576	Bowens interview notes	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1577	Tanasia Coleman Grand Jury Transcript, 11/6/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1601	Tanasia Coleman Proffer Agreement, 8/7/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1602	302 re Coleman interview, 9/25/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1603	Agent Notes of Coleman Interview, 8/7/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1604	Tanasia Coleman Proffer Agreement, 8/8/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1605	302 re Coleman interview, 10/1/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1606	Agent Notes of Coleman Interview, 8/8/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1607	Tanasia Coleman Proffer Agreement, 8/17/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1608	302 re Coleman interview, 11/7/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1609	Agent Notes of Coleman Interview, 8/17/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1610	Tanasia Coleman Proffer Agreement, 9/13/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1611	302 re Coleman interview, 10/25/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.

1612	Agent Notes of Coleman Interview, 9/13/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1613	Tanasia Coleman Proffer Agreement, 11/5/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1614	302 re Coleman Interview 11/7/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1615	Agent Notes of Coleman Interview, 8/17/2018/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1618	Tanasia Coleman Plea Form, 11/6/2018	Relevance. Fed. R. Evid. 402- 403.
1619	302 re arrest of Marcus Davis	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
1621	302 re search of 2007 Mercury Milan, LIC VWH 5583	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
1622	Search Warrant 4:18MJ90 for Mercury Milan, officer notes, Receipt for Property, Photo Log, Evidence Recovery Log, Diagram	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
1627	Matthew Ferguson Grand Jury Transcript, 6/7/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1630	Matthew Ferguson Grand Jury Ex. MF-3 Redacted	Hearsay. Fed. R. Evid. 802. Best Evidence Rule. Fed. R. Evid. 1002.
1631	Matthew Ferguson Grand Jury Ex. MF-4	Hearsay. Fed. R. Evid. 802. Best Evidence Rule. Fed. R. Evid. 1002.
1632	Matthew Ferguson Grand Jury Ex. MF-5	Hearsay. Fed. R. Evid. 802. Best Evidence Rule. Fed. R. Evid. 1002.
1731	Matthew Ferguson Proffer Letter, 5/22/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1732	302 re Ferguson Proffer, 5/22/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1733	Agent Notes of Ferguson Interview, 5/22/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1734	Matthew Ferguson Proffer Letter, 5/25/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1735	302 re Ferguson Proffer, 5/25/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.

		Improper Bolstering. Fed. R. Evid. 608.
1736	Agent Notes of Ferguson Interview, 5/25/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1737	Matthew Ferguson Proffer Letter, 5/29/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1738	302 re Ferguson Proffer, 5/29/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1739	Agent Notes of Ferguson Interview, 5/29/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1742	Matthew Ferguson Plea Form, 11/6/2018	Relevance. Fed. R. Evid. 402- 403.
1743	302 re transport of evidence seized	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
1745	302 re search of 134 Martindale Drive, Danville	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
1746	ATF Firearms Trace Summary re FIE Titan .25 cal pistol, SN 243296	Hearsay. Fed. R. Evid. 802.
1776A	Stevie Johnson Proffer Letter, 9/27/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1776B	Handwritten notes of S Johnson proffer	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1776C	302 re Proffer of S Johnson	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1777A	Stevie Johnson Proffer Letter, 9/27/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1777B	Handwritten notes of S Johnson proffer	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1777C	302 re: Proffer of S Johnson	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1778A	Stevie Johnson Proffer Letter, 10/10/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1778B	Handwritten notes of S Johnson	Hearsay. Fed. R. Evid. 802.

	proffer	Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1778C	302 re Proffer of S Johnson	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1779A	Stevie Johnson Proffer Letter, 10/11/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1779B	Handwritten notes of S Johnson proffer	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1779C	302 re Proffer of S Johnson	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1780	Stevie Johnson Grand Jury Testimony, 11/5/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1783	Stevie Johnson Guilty Plea Form, 12/7/2018	Relevance. Fed. R. Evid. 402- 403.
1784	302 re execution of search warrant at 3418 90th St, # 32, Lakewood, WA	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
1785	302 re execution of search warrant at 3418 90th St, # 32, Lakewood, WA	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
1786	ATF Firearms Trace Summary re Ruger AR-556 rifle, SN 855- 20027	Hearsay. Fed. R. Evid. 802
1800	Ashley Ross Grand Jury Transcript, 5/7/2018 (Redacted)	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608. Confrontation Clause. <i>Crawford v. Washington</i> , 541 U.S. 36 (2004)
1813	Demetrius Staten Inv 10262017 Vid000_Clip 1_s.mp4; Clip 41:00 - 43:45	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1814	Demetrius Staten Inv 10262017 Vid000_Clip 2_s.mp4; Clip 45:45 - 46:41	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1815	Demetrius Staten Inv 10262017 Vid000_Clip 3_s.mp4; Clip 47:10 - 49:42	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1816	Demetrius Staten Inv 10262017 Vid000_Clip 4_s.mp4; Clip 53:20 - 54:50	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1817	Demetrius Staten Inv 10262017	Hearsay. Fed. R. Evid. 802.

	Vid000_Clip 5_s.mp4; Clip 57:34 - 59:42	Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1818	Demetrius Staten Inv 10262017 Vid001_Clip 1_s.mp4; Clip 16:12 - 17:09	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1819	Demetrius Staten Inv 10262017 Vid001_Clip 2_s.mp4; Clip 21:30 - 26:58	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1820	Demetrius Staten Inv 10262017 Vid001_Clip 3_s.mp4; Clip 40:21 - 42:30	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1821	Demetrius Staten Inv 10262017 Vid001_Clip 4_s.mp4; Clip 44:00 - 47:11	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1822	Demetrius Staten Inv 10262017 Vid001_Clip 5_s.mp4; Clip 49:38 - 57:16	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1823	Demetrius Staten Inv 10262017 Vid001_Clip 6_s.mp4; Clip	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1824	Demetrius Staten Inv 10262017 Vid001_Clip 7_s.mp4; Clip 1:02:10 - end	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1825	Demetrius Staten Inv 10262017 Vid002_Clip 1_s.mp4; Clip 0:00 - 0:53	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1826	Demetrius Staten STATEN INTERVIEW Transcript 10-26-17	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1827	Demetrius Staten Int 11102017_Vid000_Clip 1_s.mp4; Clip 30:35 - 42:22	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1828	Demetrius Staten Int 11102017_Vid000_Clip 2_s.mp4; Clip 46:49 -47:01	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1829	Demetrius Staten Int 11102017_Vid000_Clip 3_s.mp4; Clip 1:00:00 - 1:00:25	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1830	Demetrius Staten Int 11102017_Vid001_Clip 1_s.mp4; Clip 9:55 - 12:00	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1831	Demetrius Staten interview transcript, 11-10-2017	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.

		Improper Bolstering. Fed. R. Evid. 608.
1832	Demetrius Staten Proffer Letter, 2/15/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1833	302 re Staten interview, 2/22/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1834	Agent Notes of Staten interview, 2/15/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1835	Demetrius Staten Proffer Letter, 3/2/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1836	302 of Staten interview, 3/2/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1837	Agent notes of Staten interview, 3/2/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1838	Demetrius Staten Proffer letter, 3/6/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1839	302 of Staten interview, 3/6/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1840	Agent notes of Staten interview, 3/6/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1841	Demetrius Staten Proffer letter, 3/28/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1842	302 of Staten interview, 3/28/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1843	Agent notes of Staten interview, 3/28/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1844	Demetrius Staten Grand Jury Testimony, 5/16/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1849	Demetrius Staten Grand Jury Ex. DS-5	Hearsay. Fed. R. Evid. 802. Best Evidence Rule. Fed. R. Evid. 1002.
1850	Demetrius Staten Grand Jury Ex. DS-6	Hearsay. Fed. R. Evid. 802. Best Evidence Rule. Fed. R. Evid. 1002.
1911	Demetrius Staten Plea Form, 11/6/2018	Relevance. Fed. R. Evid. 402- 403.

1912	Gang knowledge	Hearsay. Fed. R. Evid. 802.
1913	PHOTO: Line up	Hearsay. Fed. R. Evid. 802. Best Evidence Rule. Fed. R. Evid. 1002.
1914	Jaquan Trent Advice of Rights, 11/13/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1915	Trent Jaquan Int 11132018 Vid002_Clip 1_s.mp4; Clip 23:35 - 20:28	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1916	Trent Jaquan Int 11132018 Vid002_Clip 2_s.mp4; Clip 1:04:46 - 1:05:53	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1917	Jaquan Trent Interview Transcript, 11/13/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1918	Jaquan Trent Proffer Agreement, 1/22/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1919	302 re Jaquan Trent Interview, 1/22/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1920	Agent Notes of Jaquan Trent interview, 1/22/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1921	Jaquan Trent Proffer Agreement, 2/1/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1922	302 re Jaquan Trent Interview, 2/1/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1923	Agent notes of Jaquan Trent interview, 2/1/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1927	Jaquan Trent Guilty Plea Form, 3/11/2019	Relevance. Fed. R. Evid. 402- 403.
1928	Transcript of Jaquan Trent Guilty Plea Hearing, 3/11/2019	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1929	302 re search warrant executed at 248 Banner St., Danville	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.
1982A	Kevin Trent VIDEO Interview 06182018_s.mp4	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1982B	Kevin Trent 6.18.2018 Interview transcript	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.

1983	Tara Bennet Grand Jury Transcript, 5/24/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1991	Thomas Cosby Grand Jury Transcript, 5/24/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1992	Chrystal Cunningham Grand Jury Transcript, 2/14/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1993	Josephine Davis Grand Jury Transcript, 1/10/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1994	Ontwoinette Epperson Grand Jury Transcript, 5/7/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1995	Tevris Fitzgerald Grand Jury Transcript, 2/14/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
1997	Tameka Hairston Grand Jury Transcript, 2/28/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2000	Ayuanna Jeffries Facebook Convo with Jarrett Rivers	Hearsay. Fed. R. Evid. 802.
2001	Ayuanna Jeffries Facebook Convo with Jarrett Rivers 2	Hearsay. Fed. R. Evid. 802.
2003	Ayuanna Jeffries Grand Jury Transcript, 4/27/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2019	Ayuanna Jeffries Grand Jury Ex. AJ-16	Hearsay. Fed. R. Evid. 802. Authentication. Fed. R. Evid. 901
2027	Bethany Robertson Grand Jury Transcript, 2/14/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2028	Bethany Robertson Grand Jury Ex. BR-1	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2029	Ashana Snipes Grand Jury Transcript, 1/10/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2032	Sherita Bowe-Staten Grand Jury Transcript, 5/7/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2033	302 re Alexis Waddell interview, 6/14/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2034	Waddell Int_06142018_Clip	Hearsay. Fed. R. Evid. 802.

	1_s.mp4; Clip 1 2:59 - 3:19	Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2035	Waddell Int_06142018_Clip2_s.mp4; Clip2 3:35 - 5:01	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2036	Waddell Int_06142018_Clip 3_s.mp4; Clip 3 5:39 - 6:27	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2037	Waddell Int_06142018_Clip 4_s.mp4; Clip 4 6:55 - 7:23	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2038	Waddell Int_06142018_Clip 5_s.mp4; Clip 5 9:12 - 9:22	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2039	Waddell Int_06142018_Clip 6_s.mp4; Clip 6 9:43 - 9:53	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2040	Waddell Int_06142018_Clip 7_s.mp4; Clip 7 12:00 - 13:00	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2041	Waddell Int_06142018_Clip 8_s.mp4; Clip 8 13:24 - 13:53	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2042	Waddell Int_06142018_Clip 9_s.mp4; Clip 9 14:20 - 14:35	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2043	Waddell Int_06142018_Clip 10_s.mp4; Clip 10 18:12 - 19:06	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2044	Waddell Int_06142018_Clip 11_s.mp4; Clip 11 19:27 - 21:12	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2045	Waddell interview transcript	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2046	Lashanda Washington Anthony Grand Jury Transcript, 5/30/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2062	Justin Wilson Grand Jury Transcript, 1/10/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2063	302 re Terica Wilson interview, 6/28/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2064	302 re Armonti Womack interview, 11/1/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403.

		Improper Bolstering. Fed. R. Evid. 608.
2065	Agent notes of Womack interview, 11/1/2018	Hearsay. Fed. R. Evid. 802. Relevance. Fed. R. Evid. 402- 403. Improper Bolstering. Fed. R. Evid. 608.
2068	Jermay Smith Guilty Plea Form	Relevance. Fed. R. Evid. 402- 403.

WHEREFORE, for the foregoing reasons, the Defendant respectfully request that the Court grant his Motion and exclude the exhibits identified above and for such other and further relief as the Court deems necessary and appropriate.

Respectfully submitted,

SHABBA LARUN CHANDLER

By: /s/ Aaron Balla Houchens
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CERTIFICATE OF SERVICE

I hereby certify that on this 1st of August 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and the foregoing was electronically transmitted through the CM/ECF system to the following CM/ECF participants:

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